

APPENDIX E

Requests for Comment

The OIR expressly requests the parties' reaction on the following points regarding the proposed new GO 96. Parties are invited, in addition, to comment, request clarification, or make suggestions, as the parties deem appropriate.

Questions Regarding General Rules

1. Is the description of scope, as amplified also in the list of "Definitions" (General Rule 3) and the "Use of Advice Letters" (General Rule 5), clear and complete?
2. Is there any need to develop ethical rules or sanctions specific to informal matters?
3. Comment on the completeness and clarity of the definitions.
4. Comment on whether the proposed General Rules for informal filings make reasonable provision for utilizing the Internet, recognizing that access to the Internet is still not universal.
5. Regarding the boundary between advice letters and formal proceedings, comment on the clarity and appropriateness of the boundary we describe, and also on the remedies provided ("Withdrawal; Rejection Without Prejudice").
6. Comment on whether and how to define "minor" for the purpose of describing what rate increases may be requested by advice letter.
7. Comment on the clarity and appropriateness of the concept of "information only" filings.
8. Comment on all aspects of the proposed General Rules on the handling of advice letters, and also on how well they mesh with the respective Industry Rules, which elaborate on particular types of advice letters.
9. Comment on the clarity and appropriateness of the "Notice to Correct Tariff".
10. Comment on the clarity and appropriateness of the procedure regarding confidential treatment.
11. Comment on whether a "Customer Request for Deviation" procedure may be useful in the water or telecommunications industries.
12. Comment on the generic issue of whether there is a need to develop rules to allow non-utilities to file advice letters (or make a similar filing).

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Questions Regarding Energy Industry Rules

1. Suggestions and concerns about all proposed changes are encouraged.
2. Comment on preferred methods and protocols for electronic submission of documents.
3. Comment on the proposed treatment of gas storage contracts or on factors to consider in processing these contracts. Parties may also suggest similar situations warranting Tier 1 treatment (please cite the relevant statute or Commission order).
4. If parties are aware of matters other than line extensions for which the customer request procedure may be appropriate, please so indicate.
5. Comment on advantages and disadvantages of continuing the separation requirement for electric and natural gas tariffs.
6. Comment upon a reasonable schedule to implement all the Energy Industry Rules.

Telecommunications Industry Rules

1. Stakeholders' comment is invited on both the broad concepts and the implementation of those concepts through the proposed Industry Rules.
2. Do the proposed three tiers of advice letter review adequately consider the variety of services and providers within the telecommunications industry?
3. Are the rules on withdrawal of service adequate to ensure continuity of service to affected customers?
4. Are the rules on contracts clear and comprehensive?
5. Do the rules accurately compile the various exceptions and distinctions the Commission has made regarding telecommunications service since the last updating of GO 96-A (1988)?
6. Is the proposed new customer notice rule regarding rate increases clear and appropriate?

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7. Does the proposed new tariff rule 12 better express the intention of informing the public on how to get access to relevant carrier information?

Water Industry Rules

1. We invite review for completeness and clarity of the definitions and filing rules, and any suggestions to improve either.
2. We are attempting to ensure adequate notice of advice letters to all interested parties, without imposing undue burdens. If there are possible areas of improvement to this Industry Rule, please let us know.
3. We invite your suggestions for clarification or other improvements to the procedures for disposition of advice letters.
4. If there are any ways to improve the practice regarding revisions to advice letters, we would like to hear them.
5. Industry Rules 9 and 10 repeat much that is in existing GO 96-A, and they should be reviewed for correctness.
6. Some provisions of these Industry Rules require the utility to do things not presently required. For example, the preliminary statement would have to contain a description of all authorized memorandum and balancing accounts. If there are any problems with these requirements, please let us know in your comments.
7. Please comment on the appropriateness of the proposed classifications for advice letters.

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